



U.S. Department of Justice

United States Attorney
Southern District of New York

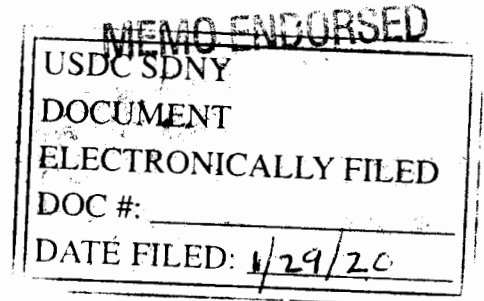
The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

January 29, 2020

BY ECF

The Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Shuai Sun*, 18 Cr. 905 (LTS)



Dear Judge Swain:

The Government writes, with the consent of counsel for defendant Shuai Sun and in an abundance of caution, to request that time be excluded under the Speedy Trial Act between today and March 18, 2020, the date of the next conference scheduled in this matter for co-defendant Xiao Yu Wang. (Dkt. No. 112). Although the Court's most recent order as to defendant Sun only excluded time under the Speedy Trial Act until January 21, 2020, (Dkt. No. 107), the Government believes that time is still being excluded because (1) the defendant's pretrial motion to suppress is still pending, *see* 18 U.S.C. § 3161(h)(1)(D) ("delay resulting from any pretrial motion, from the filing of the motion through the conclusion of the hearing on, or other prompt disposition of, such motion . . . shall be excluded . . . in computing the time within which the trial of any such offense must commence"), and (2) the Court otherwise excluded time in this case until March 18, 2020. In any event, in an abundance of caution, the Government respectfully requests that time be excluded between today and March 18, 2020.

Respectfully submitted,

GEOFFREY BERMAN
United States Attorney

SO ORDERED:

HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

By:
Alexandra Rothman
Assistant United States Attorney
(212) 637-2580

cc: Defense counsel (by ECF)

Docket Entry # 117 resolved.